



1330 AVENUE OF THE AMERICAS
NEW YORK, NY 10019
www.bursor.com

YITZCHAK KOPEL
Tel: 646.837.7510
Fax: 212.989.9163
vkopel@bursor.com

August 2, 2023

Via ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Espinal et al. v. Sephora USA, Inc., Case No. 1:22-cv-03034-PAE-GWG

Dear Judge Engelmayer:

I represent Plaintiffs in the above-captioned action. Together with counsel for Defendant, the parties jointly write pursuant to the Court's July 27, 2023 Memo Endorsement requesting a status update on discovery. ECF No. 47. The parties have exchanged written requests for production and interrogatories, as well as written responses thereto. Furthermore, Defendant has produced approximately 467 pages of documents, which Plaintiffs have reviewed. The parties are currently in the process of negotiating a discovery stipulation to cover the production of names and contact information for a sampling of putative class members to be used in connection with Plaintiffs' forthcoming motion for class certification.

Given the ongoing negotiations over class member data and subsequent depositions, the parties anticipate submitting an agreed-upon extension request of existing case deadlines. The parties request until August 11, 2023 to submit their extension request. The additional time requested will allow the class member sampling protocol to be administered and utilized for class certification purposes, while affording the parties time to take depositions and finalize discovery thereafter.

Thank you for your consideration to this matter.

Respectfully,

A handwritten signature in blue ink that reads 'Yitzchak Kopel'.

CC: All counsel of record via ECF

Yitzchak Kopel